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17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as  
25 President of the United States, et al.,

26 Defendants.  
27  
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Case No.: 3:25-cv-03070-JD

**DECLARATION OF CELESTE  
NELSON**

**DECLARATION OF CELESTE NELSON**

I, Celeste Nelson, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Support Service Specialist at the United States Department of State ("State Department"). I have worked for the State Department for 19 years. In my current role, I run a help desk that serves an administrative and organizational function supporting State Department employees who travel overseas. I also process memoranda supporting passport and visa applications for State Department employees.

3. I am the First Vice President of the American Federation of Government Employees Local 1534 ("Local 1534" or the "Union"). I have been involved in Union leadership for 7 years and have served four months as First Vice President.

4. Local 1534 currently represents a bargaining unit of approximately 7,909 civil servants who work for the State Department. Local 1534 employees include Administrative Officers, Occupational Health Specialists, Geographers, Training Specialists, Systems Accountants, Transportation Specialists, Historians, Economists, Nurses, Clinical Psychologists, Attorneys, Librarians, Engineering Technicians, and Records and Information Management Specialists. Local 1534 members work primarily in Washington, D.C., and Charleston, South Carolina. These bargaining unit members perform varied administrative, supportive, policy-focused, and systems functions that are all vital to the State Department but are not critical to national security. Despite that, it appears that the March 27, 2025 Executive Order titled "Exclusions from Federal Labor Management Relations Programs" ("Executive Order") covers all of the State Department workers in Local 1534's bargaining unit.

5. Local 1534's mission is to advocate for and promote the interests of bargaining unit members in their federal employment, including working for a safe and fair workplace for all State Department members. As the exclusive bargaining representative of these workers, the Union provides many services to all bargaining unit members. Core functions of the Union

1 include collective bargaining with the agency to obtain a fair and reasonable collective  
2 bargaining agreement ("CBAs"), filing and negotiating grievances against the agency to enforce  
3 the terms and conditions of the CBAs; pursuing arbitrations on behalf of workers to enforce the  
4 CBAs, and providing other support, guidance, and resources to bargaining unit employees.  
5 Local 1534 strives to resolve labor-management conflicts at the lowest possible level. Even in  
6 cases where formal proceedings are necessary, we aim to amicably settle cases through  
7 alternative dispute resolution whenever feasible, benefiting employees and the State Department  
8 by ensuring that minimal resources are expended on any given matter.

9         6. The Executive Order will have an immediate and severe adverse effect on the  
10 Union's ability to provide these services to unit members and to accomplish its mission.

11         7. If the Union is no longer the exclusive bargaining representative of the unit, the  
12 Union cannot enforce the four CBAs it maintains against the agency. The CBAs provide  
13 important rights and protections to workers. For instance, the CBAs:

- 14             a. Set terms and conditions for working hours, overtime, sick leave, holidays, and  
15                 paid time off for workers in the unit.
- 16             b. Impose safety and health requirements to ensure the welfare of workers in their  
17                 place of employment.
- 18             c. Establish protections for workers regarding reduction-in-force ("RIF") actions and  
19                 procedures.
- 20             d. Impose procedures for and limitations on disciplinary and adverse actions against  
21                 workers.
- 22             e. Provide for Employee Assistance Programs for individuals who have problems  
23                 associated with alcohol, drug, marital, family, legal, financial, stress, attendance,  
24                 and other personal concerns.
- 25             f. Establish grievance and arbitration procedures for employees and the Union to  
26                 resolve disputes with the agency over employment matters.

- 1 g. Provide for official time, which allows bargaining unit employees to perform  
2 union representation activities during certain amounts of time the employee  
3 otherwise would be in duty status, without loss of pay or charge to annual leave.

4 Without the Union to represent them and enforce the CBAs, the workers will not have the  
5 benefit of those rights and protections going forward. I understand that the State Department is  
6 also likely to rescind the CBAs under the Executive Order.

7 8. As a result of the Executive Order, pending grievances and arbitrations to  
8 vindicate workers' rights, including under the CBAs, will be left unresolved. Local 1534 has at  
9 least three pending grievances filed on behalf of State Department employees.

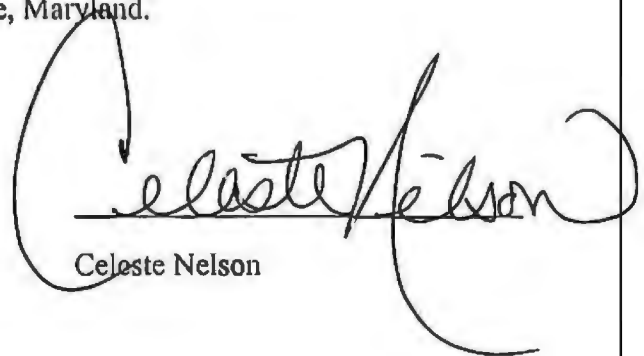
10 9. The Union's activities are funded through members voluntary dues, the vast  
11 majority of which are paid through payroll deduction from their pay. If AFGE can no longer  
12 receive dues through payroll deduction under the Executive Order, that will make it significantly  
13 more difficult for the Union to continue to function and to provide the services and protection to  
14 unit members listed above.

15 10. Official time is essential to my work as First Vice President of Local 1534. Local  
16 1534 officers already dedicate nights and weekends to representational duties. Without official  
17 time, we will be unable to meet the needs of our unit as there simply are not enough hours in the  
18 day.

19 11. The Executive Order is chilling workers' speech and activity. Typically, Local  
20 1534 facilitates conversations between employees and managers. Lately, we have taken to  
21 quietly advising employees on workplace concerns to avoid any deterioration in the relationship  
22 between employees and management, because employees fear that continuing to work with the  
23 Union will result in retaliation. Union leaders and stewards also fear retaliation for their role in  
24 the Local's representational activities. Local 1534 members have expressed their fear and  
25 uncertainty to me over the administration's targeting of federal unions and their employees.  
26 Many workers in this unit are afraid that voicing their concerns may lead to further executive  
27 action aimed at silencing federal unions.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed April 1, 2025, in Baltimore, Maryland.

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Celeste Nelson